

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA
SIXTH DIVISION

In RE:

Bky No.: 04-60106-DDO

Daniel S. Miller,
Debtor.

Adversary Case No. :04-6043

Daniel S. Miller,
Plaintiff,
vs.

**ANSWER OF JETN FARMS, LLP
TO CROSSCLAIM OF
BREMER BANK, NATIONAL ASSOCIATION**

Daniel Altepeter, Darral Altepeter, John
Altepeter, Peter Anderson, Roger Anderson,
Doug Barth, Chuck Bina, Bremer Bank National
Association, Monte Casavan, Gregory Driscoll,
Dubuque Farming Association, Emmert Farms,
Farmers Coop Grain & Seed, Kyle Haake, Roger
Hagen, Russ Halverson, Gary Hoper, J&J Gust Farms,
J.O. Thorson Farms, Inc., JETN Farms LLP,
Gorman Johnson, Loren Johnson, Walter Johnson,
Dan Juneau, Joe Juneau, Charles Kaml, Key West Farms,
KO-R Farms, Inc., K-Team, Gary Larson, Lonesome Land,
Matco, Inc., David McCollum, McWalter Farms, Inc.,
James A. Narum, Bradley Nelson, Doyle Nelson,
Jeremy J. Nelson, Patrick Noll, Erik Nymann,
Nymann Farms, Ose Farms a/k/a Joseph T. Ose,
Burl Peckman, Gary Peckman, Pederson Brothers, Peterson
Farms, PM Farming, Inc., Hans Reinhardt, Darrold Rodahl,
Larry Roisland, Gary Salentiny, Dennis Salentiny, Richard
Salentiny, Andrew Spaeth, John Spina, Howard Steinmetz,
Matt Thorson, Ronald Thorson, Tri-Mack Potato, Inc.,
United Grain & Livestock, Erwin Vanek, Dan Wichterman,
Steve D. Wollin and Gregory Wollin.

Defendants.

JETN Farms, LLP for its answer to the Crossclaim of the Bremer Bank, National Association states and alleges as follows:

1. The answering Defendant denies each and every allegation statement or assertion contained in said crossclaim except as expressly admitted, qualified or otherwise explained.

2. The answering Defendant specifically alleges that any grain that it may have removed from the Tilden bin site belonged to JETN Farms, LLP. As a result of this, JETN Farms, LLP specifically denies that it converted or deprived Bremer Bank of any interest in any crops removed from the Tilden bin site.

3. The answering Defendant is without information to form a belief as to the truth or veracity of that portion of Paragraph 1 of the Crossclaim wherein Bremer Bank claims it has a first security interest in the crops removed by JETN Farms, LLP.

4. JETN Farms, LLP is without sufficient information to form a belief as to the truth or veracity of the allegations contained in Paragraph 2 of the Crossclaim since the claim involves allegations of actions not involving JETN Farms, LLP.

5. JETN Farms, LLP specifically denies that it is indebted in a amount whatsoever to Bremer Bank.

WHEREFORE, JETN Farms, LLP, prays for the Judgment of this Court as follows:

1. Denying the crossclaim of Bremer Bank against the Co-Defendant, JETN Farms, LLP.

2. For a determination by the Bankruptcy Court that JETN, Farms, LLP, was the sole the owner of the crops that it removed from the Tilden Building site belonging to Daniel Miller. Furthermore, determining that Bremer Bank had no security interest in the crops removed by JETN Farms, LLP.

3. Granting to the Co-Defendant, JETN Farms, LLP its reasonable Attorney's fees, costs and disbursements along with such other and further relief as to the Court may deem just and equitable.

Dated: July 19, 2004.

DUFFY LAW OFFICE

/s/ Kevin T. Duffy
By Kevin T. Duffy
Attorney for JETN Farms, LLP
P.O. Box 715
Thief River Falls, MN 56701
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Attorney ID #134 600

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Defendants.

UNSWORN CERTIFICATE OF SERVICE

I, Tonya R. Klemetson, declare under penalty of perjury that on July 19, 2004, I mailed copies of the foregoing **Answer to Crossclaim of Bremer Bank, National Association** by first class certified mail postage prepaid to each entity named below at the address stated below for each entity:

Mr. Allen J. Flaten
Attorney at Law
3100 S Columbia Rd
PO Box 13417
Grand Forks, ND 58208-3417

Mr. Michael S. Dove
Attorney at Law
2700 South Broadway
P.O. Box 458
New Ulm, MN 56073-0458

Executed on: July 19, 2004.

Signed:


Tonya R. Klemetson

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